

1 WRIGHT, FINLAY & ZAK, LLP
2 Ace C. Van Patten
3 Nevada Bar No. 11731
4 Ramir M. Hernandez, Esq.
5 Nevada Bar No. 13146
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 475-7964; Fax: (702) 946-1345
9 avanpatten@wrightlegal.net
10 rhernandez@wrightlegal.net
11 *Attorneys for Defendant, Rushmore Loan Management Services LLC*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 ROBERT M. HOWELL,

10 Plaintiff,

11 vs.

12 RUSHMORE LOAN MANAGEMENT
13 SERVICES LLC; EQUIFAX INFORMATION
14 SERVICES, LLC,

15 Defendants.

Case No.: 2:18-cv-00103-APG-GWF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
DISPOSITIVE MOTIONS**

16 Defendant, Rushmore Loan Management Services LLC (hereinafter “Defendant”), and
17 Plaintiff, Robert M. Howell (hereinafter “Plaintiff”), by and through their respective attorneys of
18 record, hereby stipulate as follows:

- 19 1. Plaintiff filed a Complaint on January 19, 2018.
- 20 2. Rushmore filed an Answer to the Complaint on March 12, 2018.
- 21 3. On March 23, 2018, the Court entered a Discovery Plan and Scheduling Order [ECF
22 No. 10]. The Scheduling Order set the dispositive motion deadline for October 8,
23 2018.
- 24 4. This is the parties’ first request for an extension of the deadline to file dispositive
25 motions.
- 26 5. The extension is not being ascertained to cause undue delay or burden to the parties.

1 6. Good cause exists to grant the stipulation because the parties are discussing
2 settlement of the claims against Defendant.

3 7. The parties stipulate and agree that the parties shall have up to and including October
4 22, 2018 to file dispositive motions.

5
6 DATED this 3rd of October, 2018.
WRIGHT, FINLAY & ZAK, LLP

7 /s/ Ramir M. Hernandez

8 Ramir M. Hernandez, Esq.
9 Nevada Bar No. 13146
7785 W. Sahara Ave., Suite 200
10 Las Vegas, NV 89117
Tel: (702) 475-7964
11 Fax: (702) 946-1345
12 *Attorneys for Defendant, Rushmore Loan*
Management Services LLC

DATED this 3rd of October, 2018.
HAINES & KRIEGER, LLC

7 /s/ David H. Krieger

8 David H. Krieger, Esq.
9 Nevada Bar No. 9086
8985 S. Eastern Ave., Ste. 350
10 Henderson, NV 89123
Tel: (702) 880-5554
11 Fax: (702) 385-5518
12 *Attorneys for Plaintiff, Robert M. Howell*

13
14 **ORDER**

15 **IT IS SO ORDERED.**

16 DATED this 11th day of October, 2018.

17
18 

19 UNITED STATES MAGISTRATE JUDGE

20 *Respectfully Submitted By:*

21 WRIGHT, FINLAY & ZAK, LLP

22 /s/ Ramir M. Hernandez

23 Ramir M. Hernandez, Esq.
24 Nevada Bar No. 10751
7785 W. Sahara Ave., Suite 200
25 Las Vegas, NV 89117
(702) 475-7964; Fax: (702) 946-1345
Attorneys for Defendant, Rushmore Loan Management Services LLC